

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: APPLICATION OF PSA LLC,

Applicant,

MAKSAT IDENOV,

Case No. _____

Respondent.

_____ /

***EX PARTE* APPLICATION FOR ORDER UNDER 28 U.S.C. § 1782(a) PERMITTING
PSA LLC TO TAKE DISCOVERY FROM MR. MAKSAT IDENOV
FOR ASSISTANCE IN SWISS PROCEEDING**

Pursuant to 28 U.S.C. § 1782(a) and Rules 26, 30, 34, and 45 of the Federal Rules of Civil Procedure, applicant PSA LLC (the “Applicant” or “PSA”), respectfully requests that this Court grant an *ex parte* order in the form attached as Exhibit A authorizing Applicant to take discovery from Mr. Maksat Idenov, a resident of this District, for use in an ongoing civil proceeding in Switzerland (hereinafter the “Swiss proceeding”).

The Swiss proceeding relates to a complex, cross-border illegal bribery and corruption scheme in relation to the Kashagan and Karachaganak oil and gas development projects perpetrated against PSA by the defendants Messrs. Hormoz Vasfi, Simon Gabathuler, Victor Vasfi, Best Oil SA, Dragon Production Sàrl, Skema S.p.A., Tozzi Sud S.p.A., Messrs. Agostino Bianchi, and Mario Secondo Cerveglieri. As part of that scheme, numerous subcontractors were awarded contracts through intermediaries who secured these awards for a low initial budget, only for the contracts to be amended later, inflating the costs—often to ten times the original amount. Through the fictitious service agreements, exorbitant sums of money generated as additional costs

were then funneled into the pockets of the defendants, and into those of corrupt officials and company executives they colluded with.

Mr. Idenov was Vice-President and Managing Director at KMG (KazMunayGas), the state-owned oil and gas company of Kazakhstan which was involved in both projects, at the time when the defendants engaged in their corruption and bribery scheme. PSA has learned from the Italian criminal proceeding files and materials that Mr. Idenov was one of the Kazakh officials that the defendants in the Swiss proceeding illegally engaged with in relation to the Projects. Mr. Idenov was intimately familiar with the defendants' scheme and had personal relationships with some of the defendants. Documentary evidence suggests that Mr. Idenov may have obtained benefits under the scheme. Mr. Maksat Idenov is currently the head of Strategy and Business Development at Eni US, an affiliate of entities involved in the subcontracting scheme for the Projects. As a result, Mr. Maksat Idenov has relevant, discoverable information that will assist the ongoing Swiss proceeding.

In support of this Application, PSA submits a Memorandum of Law, incorporated by reference, and attaches the sworn declaration of Philippe Neyroud, Swiss qualified attorney and partner in the Aubert Neyroud Stüchelberg Fratini avocats Swiss law firm, with accompanying exhibits. As established in PSA's Memorandum of Law, Applicant is an "interested person" in the Swiss proceeding; the discovery sought is for "use in" that proceeding; and the target of this discovery, Mr. Maksat Idenov, "reside[s]" or is "found" in this District. PSA therefore meets all of the statutory requirements for an order allowing the discovery sought. *See* 28 U.S.C. §1782(a). As also described in the Applicant's Memorandum of Law, all of the discretionary factors that this Court may consider likewise support the requested order.

PSA therefore respectfully requests that its Application be granted.

DATED and FILED on March 25, 2025.

Respectfully submitted,

/s/ Amanda D. Price

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